

REMARKS

Claims 5 to 8 are now pending in the present application. Applicants respectfully request reconsideration of the present application in view of Applicants' remarks below.

Claim 5 was rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,072,777 to Bencheck et al.

The Bencheck reference purportedly concerns determining a root cause of error activity in a network, the root cause analysis operating on problem alert signals (PASs) generated by monitoring points in the network such as a threshold crossing alert PAS. Col. 3, lines 11-18. In Fig. 1, a network management system 100 having five layers is apparently displayed. One of those layers is labeled a network element layer (a physical layer) having various network elements used in the transport and routing of network traffic. The accompanying text recites that each network element 151 – 156 in the physical layer 150 can be designed to provide performance monitoring, alarm and status information to the higher layers in a network management system 100.

Claim 5 of the present invention is directed to controlling a telecommunications system between multiple networks, each network being designed for services or parts of services. Claim 5 requires a network management device, a service management device, and a domain manager. The domain manager has access to a selected network management device, and is linkable to the selected service management device. The network management device is assigned to each network and is controllable by the service management device.

In contrast, the Bencheck reference does not consider such a method and system. The Bencheck reference involves, as recited in the accompanying text to Fig. 1, a corporate policy layer, a lower business management layer 120, a lower network management layer 130, a lower element manager layer 140, and a lower network element layer 150, and then delves into observing root cause analysis. The Bencheck reference does not identically describe (or even suggest) that a selected service management device is *linkable* to a domain manager and controls a network management device. The Bencheck reference also does not identically describe (or even suggest) that the domain manager *has access to* the selected network management device. Instead, following Fig. 1 and accompanying text, a different system is apparent in which a network manager communicates with an element manager, and the element manager is connected to a network element.

Accordingly, Applicants respectfully submit that claim 5 is allowable over the Bencheck reference, and respectfully request withdrawal of the rejection of claim 5.

Claims 6 to 8 were rejected under 35 U.S.C. § 103(a) as unpatentable over the Bencheck reference in view of U.S. Patent No. 5,682,383 to Dahod et al. ("Dahod reference").

As discussed above, the Bencheck reference concerns a different system than the present invention described in claim 5, from which claims 6 to 8 depend.

The Dahod reference does not cure the deficiencies of the Bencheck reference.

Instead, the Dahod reference appears to concern an arrangement for interconnecting groups of users into collision domains in a Local Area Network such as an Ethernet involving a plurality of repeater groups, with each repeater group being connected to a group of user stations. The Dahod reference further refers to the arrangement involving an electronically reconfigurable switch matrix, the switch matrix having a plurality of segment lines (or other transmission media), each of which is used to form one collision domain or Ethernet segment.

Claims 6 to 8 concern a different system than the Bencheck and Dahod references, alone or in combination. In addition to the above explanation, claims 6 to 8, for example, further require a controllable matrix to link the at least one service management device to the at least one domain manager. The cited references do not teach or suggest the features of claim along with the additional features of claims 6 to 8. Accordingly, Applicants respectfully submit that claims 6 to 8 are allowable over the Bencheck and Dahod references, and respectfully request withdrawal of the rejection of claims 6 to 8.

In summary, Applicants respectfully submit that all of claims 5 to 8 of the present application are allowable for the foregoing reasons.

CONCLUSION

In view of all of the above, it is believed that any previously presented rejections of the claims have been overcome. Accordingly, it is respectfully submitted that all claims 5 to 8 are allowable. It is therefore respectfully requested that the rejections under 35 U.S.C. §§ 102(e) and 103(a) be reconsidered and withdrawn, and that the present application issue.

Respectfully submitted,
KENYON & KENYON LLP

Dated: Feb. 21, 2007

By: Richard L. Mayer *By Richard L. Mayer*
Richard L. Mayer (Reg. No. 22,490)

CUSTOMER NO. 26646

One Broadway
New York, New York 10004
(212) 425-7200 (telephone)
(212) 425-5288 (facsimile)